

Eric Fryson

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Sent: Monday, April 01, 2013 1:49 PM
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Subject: Filing Docket 130009
Attachments: Docket 130009 PEF Objections Staff 1st Interrogatories Nos. 1-2.pdf

Docket 130009-EI

In re: Nuclear Power Plant Cost Recovery Clause

1. Attached for filing is Progress Energy Florida, Inc.'s Objections to Staff's First Set of Interrogatories (Nos. 1-2).
2. This document contains three (3) pages.
3. This document is being filed on behalf of Progress Energy Florida, Inc.
4. This document is being filed by

Jeanne Costello on behalf of Blaise N. Gamba CARLTON FIELDS

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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: NUCLEAR POWER PLANT
COST RECOVERY CLAUSE

Docket No. 130009-EI
Submitted for Filing: April 1, 2013

**PROGRESS ENERGY FLORIDA, INC.'S OBJECTIONS TO
STAFF'S FIRST SET OF INTERROGATORIES (NOS. 1-2)**

Pursuant to Fla. Admin. Code R. 28-106.206, Rules 1.340 and 1.350 of the Florida Rules of Civil Procedure, and the Order Establishing Procedure, Order No. PSC-13-0063-PCO-EI, issued January 29, 2013 (the "Order"), in this matter, Progress Energy Florida, Inc. ("PEF") serves its objections to the Florida Public Service Commission Staff's ("Staff") First Set of Interrogatories (Nos. 1-2), and states as follows:

GENERAL OBJECTIONS

If any interrogatory is to be answered through production of documents pursuant to Florida Rule of Civil Procedure 1.340(c), PEF will make responsive documents available for inspection and copying at the offices of PEF, 106 E. College Ave., Suite 800, Tallahassee, Florida, 32301 at a mutually-convenient time, or will produce the documents in some other manner or at some other place that is mutually convenient to both PEF and Staff for purposes of inspection, copying, or handling of the responsive documents.

Additionally, PEF will not provide information or documents protected by the attorney-client privilege, the work product doctrine, the accountant-client privilege, the trade secret privilege, or any other applicable privilege or protection afforded by law in response to these interrogatories. PEF will provide a privilege log in accordance with applicable law or as may be agreed to by the parties to the extent, if at all, that any interrogatory calls for the production of privileged or protected information or documents.

DOCUMENT NUMBER-DATE
01597 APR-1 2013
FPSC-COMMISSION CLERK

To the extent that these Interrogatories seek to impose requirements on the responses to the Interrogatories beyond the requirements of the Florida Rules of Civil Procedure, PEF will respond to all Staff's Interrogatories consistent with the requirements of the Florida Rules of Civil Procedure, and not some inconsistent or additional requirement.

By making these general objections at this time, PEF does not waive or relinquish its right to assert additional general and specific objections to Staff's discovery at the time PEF's response is due under the Florida Rules of Civil Procedure and the Order.

Respectfully submitted this 1st day of April, 2013.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY a true and correct copy of the foregoing has been furnished to counsel and parties of record as indicated below via electronic and U.S. Mail this 1st day of April, 2013.



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